

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

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Attorneys for The Trustees of Princeton University, a not-for-profit educational corp. of the State of New Jersey (incorrectly referenced in the Complaint as "Princeton University"), Michele Minter, Regan Hunt Crotty, Joyce Chen Shueh, Walter Wright, Cole M. Crittenden, Kathleen Deignan, W. Rochelle Calhoun, Jill S. Dolan, and Sarah-Jane Leslie

JOHN DOE,

Plaintiff,

v.

PRINCETON UNIVERSITY, ET
AL.,

Defendants.

Civil Action No. 3:19-cv-07853 BRM-TJB

**NOTICE OF CONSENT MOTION TO
SEAL PORTIONS OF EXHIBITS B, C,
D & E (DKT. 19, 19-1, 19-2 and 19-3) TO
THE CERTIFICATION OF LAUREL
PYKE MALSON (DKT. 18-2)**

TO: Adrienne D. Levy, Esq.
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PLEASE TAKE NOTICE that, on September 16, 2019, at 10:00 a.m. or at such other date and time as may be determined by the Court, the undersigned attorneys for Defendants The Trustees of Princeton University, a not-for-profit educational corporation of the State of New Jersey (incorrectly referenced in the Complaint as “Princeton University”), and Michele Minter, Regan Hunt Crotty, Joyce Chen Shueh, Walter Wright, Cole M. Crittenden, Kathleen Deignan, W. Rochelle Calhoun, Jill S. Dolan, and Sarah-Jane Leslie (the “Individual Defendants”) (collectively referred to as “Defendants”), shall apply to the U.S. District Court for the District of New Jersey, at the Clarkson S. Fisher Building & U.S. Courthouse, 402 East State Street, Trenton, NJ 08608 for the entry of an Order sealing portions of Exhibits B, C, D, and E (DKT. 19, 19-1, 19-2 and 19-3) to the Certification of Laurel Pyke Malson (Dkt. 18-2) in Support of Defendants’ Motion to Dismiss filed July 10, 2019.

PLEASE TAKE FURTHER NOTICE that Defendants will rely upon the enclosed Brief in support of this application. This motion is made pursuant to Local Civil Rules 5.3(c) and 7.1.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is submitted herewith.

WONG FLEMING

Dated: July 10, 2019

By: /s/ Linda Wong
LINDA WONG

Laurel Pyke Malson (*pro hac vice*)
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Attorneys for Defendants The Trustees of Princeton University, a not-for-profit educational corp. of the State of New Jersey (incorrectly referenced in the Complaint as "Princeton University"), Michele Minter, Regan Hunt Crotty, Joyce Chen Shueh, Walter Wright, Cole M. Crittenden, Kathleen Deignan, W. Rochelle Calhoun, Jill S. Dolan, and Sarah-Jane Leslie